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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

AUDUBON SOCIETY OF PORTLAND, WILDLIFE
CENTER OF THE NORTH COAST, ANIMAL LEGAL
DEFENSE FUND, CENTER FOR BIOLOGICAL
DIVERSITY, FRIENDS OF ANIMALS,

Plaintiffs,

v.

U.S. ARMY CORPS OF ENGINEERS, U.S. FISH AND
WILDLIFE SERVICE, USDA WILDLIFE SERVICES,

Defendants.

Civil No. 15-665

**DECLARATION OF
NOAH GREENWALD**

I, Noah Greenwald, declare as follows:

1. I currently reside in Portland, Oregon, where I have lived for over 12 years.
2. I have a Bachelor of Science degree in Ecology from the Evergreen State College and a Master of Science degree in Forest Ecology and Conservation from the University of Washington.

3. I am currently employed by the Center for Biological Diversity. The Center is a nonprofit organization committed to the preservation, protection, and restoration of native species and the ecosystems upon which they depend. The Center has field offices throughout the United States, including Arizona, New Mexico, California, Nevada, Oregon, Washington, Alaska, Minnesota, Vermont, Florida, Washington, and Washington, D.C. The Center works through science, law, and creative media to secure a future for all species, great or small, hovering on the brink of extinction. The Center has more than 50,000 members and over 825,000 online supporters. The Center and its members are concerned with the conservation of imperiled species and the effective implementation of federal laws protecting wildlife.

4. Before joining the Center in 1997, I worked as a field biologist, surveying northern spotted owls and marbled murrelets and banding Hawaiian songbirds.

5. I have been a member, Conservation Biologist, and now Endangered Species Program Director of the Center for Biological Diversity for over 17 years. In these capacities, I have been responsible for monitoring the status of numerous species and ecosystems. I rely in part upon the Center to represent my interests in protecting native wildlife and their habitats.

6. The Center opposes the decision by the Corps and the U.S. Fish and Wildlife Service to kill thousands of cormorants breeding on East Sand Island in the Columbia River. On March 16, 2015, we sent detailed comments explaining why the proposed killings lack justification.

7. The Center will suffer injury in fact to their organizational interests in conserving native wildlife if the killing of thousands of cormorants is allowed.

8. The Center also has significant organizational interest in ensuring that the Service appropriately interprets and applies the statutory and regulatory provisions of the Migratory Bird Treaty Act. Any decision in the federal government's favor could set a precedent that would weaken the Migratory Bird Treaty Act and make it harder for the Center to utilize that federal law to protect birds.

9. I have a moral interest in the conservation of all native wildlife. I believe that biodiversity has inherent value. I feel saddened whenever human actions cause the decline or loss of native wildlife because I believe that humans have a responsibility to preserve biodiversity.

10. With graduate work in forest ecology and conservation and years of experience as a field biologist, I have a scientific interest in the conservation of native wildlife. The loss or decline of any wildlife species hurts my scientific interest because I lose the opportunity to study the species and the ecosystem in which that species lived.

11. I understand that the planned killing of cormorants by the Corps and the U.S. Fish and Wildlife Services will occur within a 25 km radius of East Sand Island in the Columbia River. That includes areas where I regularly visit and view birds.

12. Just this spring -- and multiple times in the past -- I went to Fort Stevens State Park to view birds, including double-crested cormorants on the Columbia River. I take joy in viewing these native birds and appreciate the peacefulness of viewing the Columbia River when I take hikes in this state park and other open spaces near the River. But I am upset when I think that these birds that I've enjoyed viewing could suffer cruel and needless deaths at the hands of government agents.

13. I have concrete plans to return to the Columbia River later this spring and into the future to look for birds, including double-crested cormorants.

14. As someone who cares deeply for wildlife and their habitats, I am upset that the Corps and the Service have decided to kill thousands of double-crested cormorants. I fear that when I go outdoors near the Columbia River to enjoy the peacefulness of the River and look for birds and other wildlife this spring and in future years I could come across federal agents killing cormorants. I might also see dead or injured birds that have been shot floating in the river or washed up on shore. This would greatly disturb me.

15. Just knowing that these killings are planned to take place and that I could be exposed to those gruesome actions diminishes my enjoyment of recreating in the Columbia River basin. It bothers me greatly to know that my tax dollars are being used to support the killings.

16. I have a moral in the conservation of all native wildlife. I feel saddened whenever human actions cause the decline or loss of native wildlife because I believe that humans have a responsibility to preserve biodiversity.

17. I have an aesthetic interest in native wildlife because I find great beauty in observing nature. The loss or decline of cormorants and other wildlife makes the world a less beautiful and wonderful place to live.

18. In sum, I have recreational, aesthetic, professional, and moral interests in the preservation of double-crested cormorants. These interests will be irreparably harmed by the agencies' decision to kill thousands of cormorants in areas near where I live and where I regularly visit. Because of the killings, there will be less cormorants for me to view and enjoy. In fact, the goal of the killing program is to reduce the cormorant population, and this loss would deprive me of the benefits I currently enjoy from these

animals. The killings would also hurt my ability to enjoy my time viewing the Columbia River because I fear that I may encounter federal agents killing birds or even see dead bodies of birds. A court decision reversing these decisions would ensure that my interests in cormorants are preserved and remain free from injury.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 17, 2015, in Multnomah County, Oregon.

A handwritten signature in black ink, appearing to read "David Greenwald", with a checkmark-like flourish at the end.

Noah Greenwald